

**UNITED STATES DISTRICT COURT
For The Southern District Of New York**

AUSTRALIAN BROADCASTING CORP.;
aka ABC AUSTRALIA;
ABC CORPORATIONS 1-100;
LIZ JACKSON; ERIC CAMPBELL;
JOSEPH A. CAFASSO; EDWARD A. ARTIS;
KNIGHTSBRIDGE INTERNATIONAL, Inc.;
KNIGHTSBRIDGE INTERNATIONAL
HUMANITARIAN RELIEF AND HUMAN
IMPROVEMENT PROGRAMS, INC.;
ROBERT C. MORRIS;
PARTNERS INTERNATIONAL FOUNDATION;
WILLIAM JOHN HAGLER,
Both Individually and Severally,
and DOES 1 through 7, inclusive,
Defendants.

**AFFIDAVIT IN SUPPORT
OF MEMORANDUM OF LAW
IN OPPOSITION TO ABC'S
MOTIONS TO DISMISS**

Case #: 08-CV-2356 (DAB)

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

I, John Edwards Tiffany, being duly sworn, deposes and says:

1. I am any attorney in this action, licensed to practice law in the State of New York and admitted to the Bar of the US District Court for the Southern District of New York, and I am familiar with all the facts and circumstances in this action.

2. I personally searched the Secretary of State records for Delaware and determined that the Australian Broadcasting Corporation was registered to do business in Delaware as a foreign corporation. A true copy of their registration is attached hereto as Exhibit 1. I also determined through private investigators that ABC has operational offices in New York and Washington, DC and regularly conducts business in those two locations.

3. In my conversations with Marcia Paul, one of ABC's attorneys she offered to provide an exchange of initial disclosures, then refused, stating "they [the documents] do not benefit our client's position and are not in our client's interest" to disclose.

4. Ms. Paul has advised us that ABC does have copies of contracts between ABC and Jack Idema and late in evening on August 18, 2008, notified that ABC would also not be providing those documents today as previously agreed.

5. During an initial conversation with Ms. Paul she stated that ABC could not be served in the United States and if we did not dismiss she would move for sanctions. When Mr. Idema, who was on a conference call informed her that ABC had a registered agent in Washington, D.C., Ms. Paul seemed quite shocked, and stated rather excitedly "my clients assured me they did not, I cannot believe they did that," or words very similar to that and to that effect.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief;

Dated: New York, New York,
August 18, 2008

A handwritten signature in black ink, appearing to read "John Edwards Tiffany", is written over a horizontal line.

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